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The draft environmental tobacco smoke ("ETS") risk assessment prepared by Dr. Brown is just that -- a draft. It has not yet been reviewed by the Environmental Protection Agency's Scientific Advisory Board ("SAB"). We much doubt that the Brown draft can survive SAB review in its present form.

Indeed, there is a very real question as to whether a risk assessment exercise focusing on ETS can be justified at all in view of the current state of the science on ETS. This question was addressed recently by a prestigious panel of scientists at an international symposium on ETS held at McGill University in Montreal, Canada.

The risk assessment panel at the McGill symposium pointed out that all ETS risk assessments that have been performed suffer from a fatal threshold flaw -- they assume, contrary to fact, that ETS has been shown to be a cause of ill health in nonsmokers. As the opening presenter on risk assessment at the McGill symposium emphasized:

"The first order of business \* \* \* is for proper studies to be carried out with respect to a possible causal link between ETS and particular diseases. If studies justifying a causal inference were to become available, we could then employ the remaining steps in the risk assessment technique."

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Thus, putting aside all of the technical inadequacies of the draft risk assessment prepared by Dr. Brown, we are left with a fundamental problem: since ETS has not been shown

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APR - 5 - 90 THU 11:47 C & B WASH DC  
APR - 5 - 90 THU 11:47 C & B WASH DC

to be a health hazard for nonsmokers, the statistical manipulations that Dr. Brown has undertaken constitute, at the very best, groundless speculation.

It is regrettable that the Environmental Protection Agency has seen fit to use its limited resources on the Brown risk assessment exercise, particularly in view of the fear and confusion that undoubtedly will be engendered by the assessment's release prior to its being reviewed by the Agency's Scientific Advisory Board.

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P. 03

APR - 5 - 90 THU 11:47 C & B WASH DC